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6 Counsel for Defendant
DEBRA EDISON

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8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11
12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 DEBRA EDISON

16 Defendant.
17 _____

)
) No. CR 07-0074 WHA

)
) STIPULATION AND [PROPOSED]
) ORDER REGARDING CONDITIONS OF
) RELEASE

)
)
) Honorable James Larson
)
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19 This Stipulation is entered into by and among the United States of America and defendant
20 Debra Edison, through their respective attorneys of record.

21 WHEREAS, the parties attended a bail review before this Court on May 13, 2008, and

22
23 WHEREAS, the parties have subsequently met and conferred regarding the conditions of
24 Ms. Edison's pretrial release, and

25 WHEREAS, the parties are in agreement to a modification of the defendant's conditions
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STIPULATION AND [PROPOSED]
ORDER REGARDING CONDITIONS
OF RELEASE; CR 07-0074 WHA

1 of release (1) permitting her to reside in a private residential facility; and (2) imposing
2 restrictions sufficient to ensure the defendant's health, safety, attendance at court proceedings
3 and compliance with all existing conditions of pretrial release.

4
5 The parties therefore agree and stipulate that the conditions of the defendant's pretrial
6 supervision shall be modified as follows:

- 7 1. The defendant shall be released from the condition that she reside at the
8 Cornell Corrections Taylor Street Facility in San Francisco, CA and
9 permitted to reside in one of the following establishments:

10 (a) The Monroe Residence Club
11 1870 Sacramento Street
12 San Francisco, CA

13 (b) The Kenmore Hotel
14 1570 Sutter Street
15 San Francisco, CA

16 (c) Such other residential facility as deemed appropriate by the
17 defendant's assigned Pretrial Services Officer.

18 The defendant shall not be released from the Cornell Corrections facility
19 until Pretrial Services has been notified that appropriate housing has been
20 arranged.

- 21
22 2. The defendant shall be subject to a curfew from 8:00 p.m. through 7:00
23 a.m., during which she is to remain within the confines of her residence.
24 This curfew shall not be enforced by electronic or telephonic monitoring,
25 but is nonetheless a Court-imposed restriction which must be observed at
26

1 all times.

2 3. The defendant shall submit to drug and alcohol testing as directed by
3 Pretrial Services.

4
5 4. The defendant shall attend mental health counseling as directed by, and
6 exclusively at a facility approved by, Pretrial Services. The defendant may
7 not obtain mental health counseling or medication for any mental health
8 condition (including anxiety and/or depression) without the knowledge
9 and prior approval of Pretrial Services. The defendant shall take any
10 prescription medication only as directed by a physician. The defendant
11 shall obtain all necessary prescription medication from a county-funded
12 care provider approved by Pretrial Services.

13
14 5. The defendant shall report in person and telephonically to Pretrial Services
15 as directed by her assigned Pretrial Services Officer. Pretrial Services may
16 impose specific reporting requirements (including daily reports) as
17 necessary to address any supervisory concerns that may arise.

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19 6. This stipulation should not be interpreted to otherwise modify or amend
20 the defendant's current conditions of pretrial release, all of which remain
21 in effect.

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1 IT IS SO STIPULATED.

2
3 DATED: May 19, 2008

4 _____/S/
JEFFREY R. FINIGAN
5 Assistant United States Attorney

6
7 DATED: May 19, 2008

8 _____/S/
ERIC MATTHEW HAIRSTON
9 Assistant Federal Public Defender
Attorney for Defendant

10
11 **[PROPOSED] ORDER**

12 The conditions of Debra Edison's pretrial release are hereby modified as follows:

- 13 1. The defendant shall be released from the condition that she reside at the
14 Cornell Corrections Taylor Street Facility in San Francisco, CA and
15 permitted to reside in one of the following establishments:

- 16 (a) The Monroe Residence Club
17 1870 Sacramento Street
San Francisco, CA
18
19 (b) The Kenmore Hotel
1570 Sutter Street
San Francisco, CA
20
21 (c) Such other residential facility as deemed appropriate by the
defendant's assigned Pretrial Services Officer.

22 The defendant shall not be released from the Cornell Corrections facility
23 until Pretrial Services has been notified that appropriate housing has been
24 arranged.
25

2. The defendant shall be subject to a curfew from 8:00 p.m. through 7:00 a.m., during which she is to remain within the confines of her residence. This curfew shall not be enforced by electronic or telephonic monitoring, but is nonetheless a Court-imposed restriction which must be observed at all times.
3. The defendant shall submit to drug and alcohol testing as directed by Pretrial Services.
4. The defendant shall attend mental health counseling as directed by, and exclusively at a facility approved by, Pretrial Services. The defendant may not obtain mental health counseling or medication for any mental health condition (including anxiety and/or depression) without the knowledge and prior approval of Pretrial Services. The defendant shall take any prescription medication only as directed by a physician. The defendant shall obtain all necessary prescription medication from a county-funded care provider approved by Pretrial Services.
5. The defendant shall report in person and telephonically to Pretrial Services as directed by her assigned Pretrial Services Officer. Pretrial Services may impose specific reporting requirements (including daily reports) as necessary to address any supervisory concerns that may arise.

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6. This Order should not be interpreted to otherwise modify or amend the defendant's current conditions of pretrial release, all of which remain in effect.

IT IS SO ORDERED.

DATED: _____

THE HON. JAMES LARSON
United States Chief Magistrate Judge